

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 0:23-cv-60057-WPD

JOSHUA BERDUGO, individually an on  
behalf of all other similarly situated,

Plaintiff,

v.

GEMINI TRUST COMPANY, LLC;  
TYLER WINKLEVOSS; and  
CAMERON WINKLEVOSS

Defendant.

\_\_\_\_\_/

**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of John F. Baughman, Esquire of the law firm of JFB Legal, 299 Broadway, Suite 1816, New York, New York, 10007, (212) 548-3212, for purposes of appearance as co-counsel on behalf of Defendants, Gemini Trust Company, LLC, Tyler Winklevoss, and Cameron Winklevoss in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit John F. Baughman, Esquire to receive electronic filings in this case, and in support thereof states as follows:

1. John F. Baughman is not admitted to practice in the Southern District of Florida and is a member in good standing of the New York State Bar Association, the Virginia Bar Association and the United District Court for Eastern District of New York, the United States District Court

for Western District of New York, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of Virginia, the United States District Court for the District of Columbia, the First Circuit Court of Appeals, the Second Circuit Court of Appeals and the Third Circuit Court of Appeals.

2. Movant, Dennis M. Campbell, Esquire, of the law firm of Campbell Law Firm PLLC, 201 Alhambra Circle, Suite 602, Coral Gables, Florida 33134, (305) 444-6040 is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, John F. Baughman has made payment of this Court's \$200.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. John F. Baughman, Esquire, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to John F. Baughman, Esquire at email address: [jbaughman@jfblegal.com](mailto:jbaughman@jfblegal.com)

WHEREFORE, Dennis M. Campbell, Esquire, moves this Court to enter an Order for John F. Baughman, Esquire to appear before this Court on behalf of Defendants, for all purposes relating

the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Jack Baughman.

Date: February 7, 2023

Respectfully submitted,

/s/ Dennis M. Campbell

Dennis M. Campbell

Florida Bar No. 271527

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*Attorneys for Defendants*

*GEMINI TRUST COMPANY, LLC;*

*TYLER WINKLEVOSS; and*

*CAMERON WINKLEVOSS*